## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS EL PASO DIVISION

D.A., A.A., and LUCINDA DEL CARMEN	)
PADILLA-GONZALES,	)
Plaintiff,	) EP-22-CV-00295-FM
v.	)
UNITED STATES OF AMERICA,	)
Defendant.	)

### JOINT MOTION TO STAY DISCOVERY AND DEADLINES

Plaintiffs D.A. and A.A. and their mother, Lucinda del Carmen Padilla-Gonzales, and Defendant United States of America (hereinafter, "Parties") hereby jointly move to stay all discovery and deadlines as to Plaintiffs' claims against Defendant United States of America. In support, they state:

- 1. The Parties have reached an agreement in principle that contemplates resolution of all of Plaintiffs' remaining claims against Defendant United States of America, subject to terms.
- 2. While the parties have reached a tentative agreement to resolve this matter, subject to terms, there are still several steps outstanding before this matter may come to a close.
- 3. First, the parties must come to agreement on the formal written agreement needed to resolve this matter, including the terms of the agreement. After the parties have reached agreement on those terms, the Court must approve the settlement, because Plaintiff A.A. is still a minor. Finally, once the Court has approved the settlement, including the amount to be apportioned to Plaintiff A.A., the United States Department of Justice must provide final approval of the settlement, including the division of funds, before counsel for the United States

may sign the final settlement agreement.

- 4. The parties believe a stay of 60 days will allow adequate time for these steps to be completed, including for the Court to review the settlement to determine if it should be approved.
- 5. Accordingly, the Parties ask that the Court stay the current discovery schedule and all other deadlines for Plaintiffs and Defendant United States of America for 60 days.

WHEREFORE, the Parties jointly request that this Court grant their motion and stay further briefing and deadlines as to Plaintiffs' claims against Defendant United States of America.

Respectfully submitted,

April 22, 2024

/s/ Annie Prossnitz

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Plaintiff,	) EP-22-CV-00295-FM
<b>v.</b>	)
UNITED STATES OF AMERICA,	)
Defendant.	)
PROPOSED ORDE	R STAYING DISCOVERY
Pursuant to the Parties' joint motion	to stay discovery after having reached a settlement in
principle, IT IS HEREBY ORDERED that d	iscovery and all accompanying deadlines are stayed
in the above captioned case for 60 days.	
Signed on the day of	2024, El Paso, Texas.
	THE HONORABLE FRANK MONTALVO

SENIOR UNITED STATES DISTRICT JUDGE